

MYNOR ABDIEL TUN-COS, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:17-cv-943
)	
B. PERROTTE, <i>et al.</i> ,)	
)	
Defendants.)	
)	

Defendants B. Perrotte, T. Osborne, D. Hun Yim, P. Manneh, and A. Nichols hereby respectfully move this Court to stay proceedings in the above-captioned action until the earlier of June 4, 2018, or the filing a notice of appeal with the Fourth Circuit seeking review of this Court's April 5, 2018 Order, in which the Court found that it has subject-matter jurisdiction; that Plaintiffs have a damages remedy under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), for their Fourth and Fifth Amendment claims; and that Defendants are not entitled to qualified immunity on those claims. *See* Dkt. #50, April 5, 2018 Order, at 3. This motion is based on the accompanying memorandum. A proposed order is attached.

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DATED this 16th day of April, 2018.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to:

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